tract is illegal, instead of merely making it void. For then, as under the American statutes, the vice of the original transaction would taint the subsidiary one and the purpose of the statute would not be defeated.

WILLS — EXECUTION — SIGNATURE OF TESTATOR AT END OF WILL. — A will was written on three pages of a folded sheet of paper. In drawing up the will, the testatrix wrote the first page, then the third, and finished on the second, where she signed at the completion of her disposition. *Held*, that the will was signed "at the end thereof," within the meaning of the statute. *In re Stinson's Estate*, 77 Atl. 807 (Pa.).

The authorities on this point are confined to England, New York, and Pennsylvania. In accordance with the more liberal doctrine of the principal case, the English courts have held in similar cases that the end of a will is the logical end. *In the Goods of Watton*, L. R. 3 P. & D. 159; *In the Goods of Stoakes*, 23 Wkly. Rep. 62. So, too, where matter following the signature, in point of space, is incorporated by reference or by the logical sequence of the language into a part preceding the signature, the courts of both jurisdictions have held this to be a sufficient compliance with the statute. *Baker's Appeal*, 107 Pa. St. 381; *In the Goods of Birt*, L. R. 2 P. & D. 214. But the New York courts have adopted a stricter interpretation, and require the signature to be at the physical end of the instrument. *Matter of Andrews*, 162 N. Y. 1; *Matter of Conway*, 124 N. Y. 455. See also 13 HARV. L. REV. 686.

WITNESSES — PRIVILEGE AGAINST SELF-INCRIMINATION — USE OF BODY AS AN EXHIBIT. — The defendant, while before a military court of investigation, was compelled to put on a blouse, found near the scene of a murder, to see whether it fitted him. The defendant was later indicted, and at the trial a witness testified that the prisoner put the blouse on and it fitted him. *Held*, that the evidence is admissible. *Holt* v. *United States*, U. S. Sup. Ct., Oct. 31, 1910.

The privilege against self-incrimination properly applies only when the evidence would have to be furnished by the person claiming the privilege in the capacity of one uttering testimony. It is not so broad as to protect the defendant in every respect from being the means by which evidence tending to incriminate him is produced. To use a man as an exhibit does not infringe the privilege; to treat him as a witness to extort communications from him does. See 3 WIGMORE, EVIDENCE, §§ 2250, 2251, 2263, 2265. But often the privilege has been extravagantly extended to exclude the use of the body as an exhibit. *State* v. *Jacobs*, 5 Jones, Law (N. C.) 259 (exhibiton to jury to prove amount of negro blood); *Blackwell* v. *State*, 67 Ga. 76 (standing up to show defendant lacked one foot); *Stokes* v. *State*, 5 Baxt. (Tenn.) 619 (making footprints). Nor does a distinction between using the evidence to prove the issue of identification and using it to prove any other issue seem tenable, since the issue of identification is equally material to the proof of guilt. *Contra*, *State* v. *Johnson*, 67 N. C. 55. In many cases the court might refuse to permit such evidence on other grounds. See *People* v. *McCoy*, 45 How. Prac. (N. Y.) 216; *State* v. *Height*, 117 Ia. 650. *Cf. Union Pacific Ry. Co.* v. *Botsford*, 141 U. S. 250. The principal case accords with many authorities in supporting the above analysis, and declares what is undoubtedly the proper limits of the privilege. *State* v. *Ah Chuey*, 14 Nev. 79 (tattoo marks on chest); *State* v. *Graham*, 74 N. C. 646 (putting foot in footprints). But see 22 Alb. L. J. 144.